



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

HDM/GN/PC/MC/JRS  
F.# 2016R00695

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 11, 2024

By ECF and Email

The Honorable Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Manuel Chang  
Criminal Docket No. 18-681 (NGG)

Dear Judge Garaufis:

The government submits this letter in response to the Court's October 11, 2024 Order advising the Court "as to the reason for the Government's delay in providing Probation with the documents needed to prepare the offense conduct section of the presentence report."

The government never received a request for any documents from the Probation Department for the defendant. The government has conferred with the Probation Department, and the Probation Department has reviewed their records and confirmed that no request was sent to the government for documents for the defendant. Thus, there was no failure to provide any documents by the government because no such request was ever made.<sup>1</sup>

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<sup>1</sup> The Court should disregard the baseless and inflammatory accusations made by defense counsel in its letter filed earlier today (which were made without taking any steps to confer with the government in advance of filing).

The Probation Department has now requested documents today and the government will provide them by Monday to ensure that there is no delay in the defendant's sentencing, and it can go forward as soon as possible.

Respectfully submitted,

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cc: Clerk of Court (NGG) (by ECF)  
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